



September 10, 2015

Mark Schaefer, PhD
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Office of the Healthcare Advocate
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SUBJECT: SIM Equity and Access Council Draft Report

Dear Mark:

We appreciate the opportunity to submit comments to the SIM Program Management Office about the Draft SIM Equity and Access Council Report. CHA supports all of the recommendations but would like to offer the following specific comments on the draft report:

Cost Target Calculation

CHA is pleased that Recommendation 2.2 provides for an adjustment for unpredicted healthcare system costs, but would suggest that it be strengthened to require an independent third-party validation of the amount of the adjustment to assure neutrality, and that actuarial science is applied to the calculation.

Incentive Payment Calculation and Distribution

As you know, Recommendation 3.5, which pertains to the reinvestment of non-retained savings, was one of the most discussed topics. CHA advocated for and supported reinvesting the savings back into patient care and other quality improvement initiatives. The non-retained earnings should not be distributed to an independent private entity or used for any purpose other than to improve patient care in the community from which the non-retained earnings was generated.

Supplemental Safeguards: Rules, Monitoring, and Accountability

CHA supports Recommendation 4.7, and requests that the analysis include a component that incorporates comments and feedback from providers and hospitals prior to the publication of the summary report.

Supplemental Safeguard – Communication

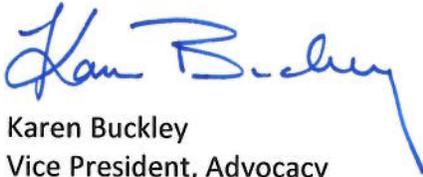
CHA supports initiatives to educate consumers and would encourage the inclusion of a hospital representative as one of the providers included in the stakeholders work group. Consumer education should be framed in such a way as to foster, and not erode, communication between providers and patients, and should include issues such as “over-service” and “under-service,” as

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September 10, 2015
Page 2

discussed in the Design Workgroups. For example, there are good consumer communication tools like Choosing Wisely, which emphasize getting the right service at the right time, not simply service after service. CHA recommends that consumer education that meets the CLAS Standards be provided, and that it be provided at a level that can be comprehended by the targeted population.

CHA appreciates the opportunity to offer comments and participate in the SIM Equity and Access Council Design Group Workshops.

Sincerely,



Karen Buckley
Vice President, Advocacy

KMB:ljs
By E-Mail